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Attorneys for Plaintiffs Napoleon Ebarle, Jeanne Stamm, Brian Litton, and Reiner Jerome Ebarle

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NAPOLEON EBARLE, JEANNE
STAMM, BRIAN LITTON, and REINER
JEROME EBARLE on behalf of
themselves and all other similarly situated,

Plaintiffs.

V

LIFELOCK, INC.

Defendant.

Case No. 3:15-cv-258

**DECLARATION OF NAPOLEON
EBARLE IN SUPPORT OF PLAINTIFFS'
MOTION FOR AWARD OF ATTORNEYS'
FEES AND EXPENSES AND FOR
SERVICE AWARDS FOR PLAINTIFFS**

Date: June 23, 2016
Time: 2:00 PM
Courtroom: 15, 18th Floor
Judge: Hon. Haywood S. Gilliam Jr.

1 I, Napoleon Ebarle, under penalty of perjury, declare as follows:

2 1. I am a named Plaintiff and Class Representative in the above-captioned case (the
3 "Action").

4 3. I submit this Declaration in support of Plaintiffs' Motion for Award of Attorneys'
5 Fees and Expenses and for Service Awards for Plaintiffs ("Fee Application"), and have personal
6 knowledge of the matters set forth below.

7 4. Prior to entering this litigation, I was informed by Class Counsel of the general
8 duties of a Class Representative. I understood and acknowledged that as a Class Representative, I
9 was expected to adequately and fairly represent the Class, and I agreed to fulfill these duties. As
10 such, I have always considered the interests of the entire Class and have remained informed and
11 interested, on a continuous basis, in the progress of this lawsuit.

12 5. As a Class Representative, my claims are typical of those of the Class and I do not
13 possess any interest in this Action that is antagonistic to other Members of the Class.

14 6. As a Class Representative, I have volunteered my time and agreed to represent the
15 interests of many other people with identical and/or similar claims and damages because of the
16 importance that all benefit from the lawsuit, and I have retained competent counsel, experienced in
17 class action litigation.

18 7. As a Class Representative, I have performed various tasks for the benefit of the
19 Class, including the following:

20

- 21 • Assisting with the factual development of the Action, including assisting my
22 attorneys in understanding LifeLock's products, representations made in
23 relation thereto, and reliance of customers;
- 24 • Collecting and submitting information to my attorneys;
- 25 • Reviewing and authorizing the filing of complaints and pleadings in this

1 Action;

2 • Answering and responding to informal document requests and assisting my
3 attorneys in preparing for mediation; and
4 • Monitoring and authorizing the proposed Settlement.

5 8. Given all the considerations and the inherent uncertainties of litigation, I believe the
6 proposed Settlement, which creates a cash settlement fund of \$68,000,000 ("Settlement Fund"),
7 provides valuable compensation to the Class, is fair and reasonable, and in the best interest of the
8 Class.

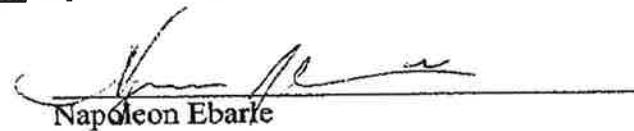
9 9. I understand that separate and apart from the Settlement Fund, LifeLock has
10 agreed to pay up to \$10.2 million in attorneys' fees and costs. As such, the recovery to the Class
11 will not be reduced in any way by attorneys' fees.

12 10. I have never been promised any compensation for performing my duties as a
13 Plaintiff and Class Representative. I understand, however, that the parties have requested the Court
14 to award me \$2,000 for my time and efforts on behalf of the Class. I will be most appreciative if
15 the Court determines that my efforts on behalf of the Class in commencing and assisting with the
16 prosecution of this Action warrant an award in that amount.

17 11. As a Class Representative, I have always understood that the resolution of this
18 lawsuit is subject to Court approval and must be designed in the best interest of the Class as a
19 whole, and I, along with Class Counsel, have actively participated in this Action with the goal of
20 obtaining the most beneficial recovery for the Class. I believe that together Class Counsel and the
21 Class Representatives were able to achieve this goal and secure significant, immediate benefits for
22 the Class. Consequently, I support the proposed Settlement and Fee Application in this Action.

1 I declare under penalty of perjury that the foregoing is true and correct and that this
2 declaration was executed on this 15 day of March, 2016.

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4 Moraga, California


Napoleon Ebarle

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